

**TECHNICAL REVIEW DOCUMENT
FOR
RENEWAL OF OPERATING PERMIT 00OPDO225**

to be issued to:

TransColorado Gas Transmission Company
Dolores Compressor Station
Dolores County
Source ID 0330019

Cathy Rhodes
February, 2005

I. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued February 1, 2001 and expires on February 1, 2006. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted February 2, 2005. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

II. Source Description

This facility is located in Dolores County, on private land surrounded by the San Juan National Forest approximately 13 miles northeast of Dolores, Colorado and 0.6 miles east of Beaver Creek. The area is classified as attainment for all pollutants. Mesa Verde National Park is a Federal Class I designated area within 100 kilometers of the plant. Utah and New Mexico are affected states within 50 miles.

The Dolores Compressor Station is a natural gas transmission facility. Natural gas is compressed for transmission to sales pipelines using reciprocating engines driving gas compressors. Electrical power is also generated on-site, for use at the station, using reciprocating engines driving generators.

Based on information provided by the applicant, the facility is not subject to the requirements of 112(r) (Accidental Release Program).

The source emits major amounts of Hazardous Air Pollutants (HAPs). The EPA

promulgated Maximum Achievable Control Technology (MACT) standards for Oil and Natural Gas Production Facilities, and for Natural Gas Transmission and Storage Facilities on June 17, 1999. Facilities that do not contain affected sources (glycol dehydration units, storage vessels with the potential for flash emissions, etc.), are not subject to the MACT requirements. The Dolores Compressor Station does not contain any affected sources, and is not subject to these MACT requirements. Some engines at this facility are subject to the Reciprocating Internal Combustion Engine MACT requirements.

Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential (TPY)</u>	<u>Actual (TPY)</u>
Nitrogen Oxides (NO _x)	89	66
Volatile Organic Compounds (VOC)	60	44
CO	161	155
Formaldehyde (Single HAP)	N/A	14
Total HAPs	N/A	19

Potential emissions are based on permitted emission limits. Actual emissions are based on the most recently submitted APEN.

II. Discussion of Modifications Made

Source Requested Modifications

The permittee requested the following revisions to the Operating Permit in their renewal application.

Section I

Condition 6 – Revised to indicate that CAM does not apply to S05. Pre-control emissions of CO are 81.4 tons/year, which is less than 100 tons/year, therefore CAM does not apply to S05.

Section II

Conditions 1.1 and 1.2: Emission limits and throughput limits are separated for S01 and S02. Emission limits and throughput limits are also separated for S03 and S04. The fuel sampling requirements are clarified to indicate that the BTU content of the fuel will be based on the lower heating value.

Condition 1.5 is added to incorporate the RICE MACT provisions.

(Note: Any engines >500 HP that permanently replaced an existing engine as of the RICE MACT compliance date are subject to the MACT requirements.)

Other Modifications

This permit was recently modified on June 14, 2004 to add a new compressor engine. Additional revisions were made at that time to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of the modification. The following additional modifications are made to the permit.

Section I

Condition 2 – Update to include most recent AOS. Since this facility is major for HAPs, engines which permanently replace current engines may become subject to the MACT requirements for Reciprocating Engines. The permanent engine replacement AOS is provided to major sources of HAPS provided the source demonstrates one of the following:

- All engines at the facility are site rated at 500 hp or less and therefore not affected sources under the RICE MACT (all engines at this facility are rated greater than 500 hp); or
- A list of specific engines (i.e. by permit numbers and/or serial numbers) is provided and the source provides information specifying each engine's applicability to the RICE MACT. If any replacement engine would be considered not subject to the RICE MACT requirements because the engine is an "existing" unit, the source shall submit information demonstrating that the "existing" engine is not a "reconstruction"; or
- Any replacement engine would be considered a "new" engine under the RICE MACT.

Condition 3 – Update Regulation No. 3 cites.

Section II

Condition 1.4 – Catalytic Oxidizer Parameter Monitoring language is revised to reflect current Division periodic monitoring requirements.

Section III

Update permit shield regulatory cite.

Section IV

Update to reflect recent revisions made to Regulation No. 3 cites.

Appendices B and C

Incorporate Division's latest versions.